US EPA RECORDS CENTER REGION 5

## STATE OF MICHIGAN





WILLIAM G. MILLIKEN. Governor DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING, BOX 30028, LANSING, MICHIGAN 48909 **HOWARD A. TANNER, Director** 

June 12, 1978

Mr. Jeffery L. Dauphin Engineering Planning Coordinator West Michigan Environmental Action Council 1324 Lake Drive, S.E. Grand Rapids, Michigan 49506

Dear Mr. Dauphin:

NATURAL RESOURCES COMMISSION

CARL T. JOHNSON

HILARY F. SNELL HARRY H. WHITELEY

JOAN L. WOLFE

CHARLES G. YOUNGLOVE

E. M. LAITALA **DEAN PRIDGEON** 

You May 26, 1978 letter has been referred to me for reply.

The concerns you expressed relative to the disposal of the waste resulting from the Story Chemical Company property cleanup are the same concerns I and others expressed before and during the cleanup operation. Our actions were predicated on safely removing and disposing of the waste at Story Chemical Co. in an environmentally sound and legal fashion.

Since you appear to be most concerned with the cleanup as it relates to the Plainfield Township facility I would like to state that no chemical wastes, as such, from the Story cleanup was deposited in the Kent County Landfill. Solid material of a non hazardous nature associated with the cleanup was deposited in that landfill. Solids that were classified as nonhazardous include empty drums, pallets that these drums were stacked on, old tubing, pipes, wood etc. These items were crushed and sent with the sand they were crushed on to an acceptable disposal site for non-hazardous waste.

Persons from the Resource Recovery Division, Michigan Department of Natural Resources, Kent County Health Department and the Kent County Department of Public Works all emphatically declared that no hazardous waste was to be hauled to the Kent County landfill. In order to assure compliance with that requirement and to further insure that all material removed from the Story facility was handled in a safe, legal, environmentally acceptable fashion the following procedures were followed:

All drums containing liquids were opened, sampled, analyzed by 1. gas chromatography, infrared spectrophotometry, nuclear magnetic resonance spectrometry, bomb colorimetry and solvent and water solubility tests. In addition these samples were mixed in the lab to determine their compatability before they were removed from their container.



2. All liquid material encountered during the cleanup operation was either reclaimed or incinerated at a facility with proper air emmissions control apparatus. No liquid of any nature was land filled anywhere as a result of this operation.

Solids and contaminated soils were handled in exactly the same manner as the liquids. They were sampled, mixed, identified, classified as to toxicity and then then sent to a disposal site that was environmentally sound.

No manifest exists for the solid waste deposited in the Kent County landfill or in any of the other landfills for that matter. Manifests for the liquid waste are available and I will be glad to forward copies of those manifests to you if you so desire. I can furnish you with receipts and other items that you requested that will verify my statements. Unfortunately, much of this material has been submitted to bookkeeping for payment at this time. I'll be glad to send a machine copy of all items you request when returned to me if you so desire. The cost of reproduction is 20 cents per page.

The authorization to send materials to various disposal sites is something that gradually developed as a consequence of the dynamic nature of this project. Generally speaking, however, persons from the Department of Natural Resources, Resource Recovery and Air Quality Divisions were contacted relative to potential disposal sites for material from the Story cleanup. Local officials were then contacted for input relative to those sites. I then personally inspected all disposal facilities and when the chemical information became available, selected an appropriate dispoal site based on input from all of the above mentioned people and the chemical analysis.

Specifically, relative to the non-hazardous solid waste, no special approval was deemed necessary beyond contacting persons from Resource Recovery and local officials relative to the general acceptability of the site in question.

In conclusion, your statement that it is difficult to believe that the material disposed of in Plainfield Township could have been so carefully sorted and of such uniform consistency to contain only traces of so called "harmless waste" is understandable due to your absence from the site during the cleanup operation. Every drum on that site that could be handled was physically segregated, sampled, classified and disposed of. The wastes that could not be sorted were sampled in situ by literally climbing through the various piles and sampling by color, consistency and other physical charasterics of the waste. None of these wastes were disposed of until they were analyzed and classified. We appreciate your concern over the safe operation of this disposal project and welcome your input. I'll be happy to furnish you with the data that you requested relative to information we used to make our decisions as it becomes available if you so desire.

If you have any additional questions or requests please contact me at (517) 373-2794. I would be most happy to discuss this matter further with you at your convenience.

Very truly yours,

WATER QUALITY DIVISION

James Miller
Water Quality Specialist
Oil and Hazardous Materials Control
Section

## JM:tkr

cc: H. Tanner

- W. Tody
- F. Kellow
- B. Turney
- F. Kelley
- R. Courchaine
- W. Denniston
- J. Shauver

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